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Aiken, SC 29803

MAY 13 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 12, 1993

Ms. Donna R. Searcy
Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street NW - Room 222
Washington, DC 20054

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FCC MAIL BRANCH

RE: COMMENTS AND COUNTERPROPOSAL TO MM DOCKET NO. 93-47,
Amendment of FM Table of Allotments, Camden, Latta and
Marion, South Carolina.

Dear Ms. Searcy:

Enclosed please find an original and five copies of the "Comments And Counterproposal" of Joseph Adams Ranke, which are tendered hereby concerning MM Docket 93-47. In addition to his comments regarding the above referenced matter, he is filing a counterproposal seeking the allotment of Channel 232A to Blythewood, SC as that community's first FM service.

Included in this pleading is engineering data which shows that Channel 232A will meet the current Commission spacing requirements for allotment to Blythewood, SC.

Should you require further information, please contact the undersigned. Thank you in advance for your time and assistance in this matter.

Sincerely,

Joseph Adams Ranke

Joseph Adams Ranke

(803) 648-9143

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MAY 13 1993

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of) MM Docket No. 93-47
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
)
Camden, Latta and Marion,) RM-8188
South Carolina)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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COMMENTS AND COUNTERPROPOSAL

Joseph Adams Ranke ("Ranke"), hereby respectfully submits his comments on and counterproposal to the Commission's Notice of Proposed Rule Making ("NPRM"), in MM Docket No. 94-47 (RM-8188).
As set forth herein, Ranke respectfully requests the Commission

South Carolina, as that community's first local FM service, by modifying of the license of WWPB(FM), Channel 232A, Marion, South Carolina, specifying operation on the higher class channel, at a new community of license (reference coordinates: 34°25'33"N / 79°29'57"W).

Discussion

For the reasons set forth herein, Ranke requests the Commission allot Channel 232A to Blythewood, South Carolina,² instead of granting the proposed upgrade of WWPB(FM). The proposed allotment at Blythewood would be made possible utilizing the same channel substitution for WPUB-FM at Camden, as proposed in MM Docket No. 93-47 (RM-8188). **Ranke requests that the channel substitution at Camden be made as proposed.** In that regard, Ranke fully recognizes and accepts responsibility to reimburse the licensee of WPUB-FM for the reasonable costs of modification to its facilities in moving to the new channel, should the Commission grant his proposal and should he be awarded a construction permit to build the new facility at Blythewood.

Blythewood, South Carolina is a growing incorporated community in Richland County (1990 population 146), which fully

² An allocation reference point of 34°05'30"N / 80°55'30"W is used for the proposed allotment at Blythewood. The allotment is site restricted approximately 9 miles south-southeast of Blythewood to allow the allotment to meet the spacing requirements with respect to WMUU(FM), Channel 233C, Greenville, South Carolina. This reference point is at a spot which is near the maximum distance away from the proposed reference coordinates at Blythewood.

meets the Commission's criteria for allotment purposes. Blythewood is governed by a mayor, a town administrator, and a four-member town council. The community has its own Post Office, Public Library, local branch banks, and commercial businesses.

Allotment of Channel 232A to Blythewood would represent the community's first full-time broadcast service (a daytime AM was allotted to the community some years ago, however it has never been constructed).

The proposed allocation of Channel 232A, and WWPD(FM)'s proposed upgrade to Channel 232C3 at Latta, are mutually exclusive. An attempt was made by our engineering firm to find alternative channels for use either at Blythewood or Camden, or for an upgrade to Class C3 at Latta, however this attempt was unsuccessful. The best (and only) substitution available which

The counterproposal set forth herein, therefore falls under priority 3, since Blythewood, SC would receive Channel 232A as its first local service. The proposed simultaneous upgrade of WWPD(FM) and change in community of allotment, also falls under priority 3, as Latta would receive its first local service. The WWPD(FM) upgrade would fall under priority 4, other public interest matters.

Ranke believes that if priority 4 is analyzed in regard to both proposals, the allotment of Channel 232A to Blythewood will better serve the public interest. The upgrade of WWPD(FM) would allow it to provide additional coverage to a moderately populated area, however, the site restriction requirements of that proposal are such that a significant number of persons now within WWPD's 1.0 mV/m signal would be outside of the 1.0 mV/m contour of the C3 at Latta.

By contrast, the allotment of Channel 232A to Blythewood, will provide additional service in a heavily populated area, and will project significantly more population coverage than the net gain of the proposed C3 at Latta. This being the case, allotment of Channel 232A to Blythewood, South Carolina should be favored over the proposed upgrade and change in city of license of WWPD(FM).

An up to date engineering allocation/separation search shows the proposed New FM at Blythewood will meet all Commission spacing requirements if WWPD(FM) remains on Channel 232A at Marion (see Exhibits E1 and E2, attached).

Ranke affirms unequivocally that if the proposed allotment of Channel 232A to Blythewood, South Carolina is made, the petitioner will tender an application for construction permit for the New FM, and if granted a construction permit, will build the facility promptly.

Wherefore, in light of the foregoing, Ranke believes that approval of his counterproposal is to be preferred, as it is in the public interest and it represents a more efficient use of the spectrum than that offered in the NPRM, MM Docket 93-47.

Respectfully submitted,

By Joseph Adams Ranke
Joseph Adams Ranke

966 Athol Avenue
Aiken, SC 29803
(803) 648-9143

May 12, 1993

ASSOCIATED RADIO RESOURCES, INC.
CHARLESTON, SC

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FM Spacing Study

Title: Blythewood, SC
Channel 232A (94.3 MHz)
Database: ARR 04/14/93

Latitude: 34-05-30
Longitude: 80-55-30
Safety zone: 26 km

Call	Auth Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WQKI-FM LIC	RADIO FOUR BCSTING INC	230A	3.00	33-36-13	167.6	55.46	31
SAINT MATTHEWS	SC BLH-920219KA	93.9	100	80-47-48	347.6	24.46	CLEAR
WPUB-FM LIC	KERSHAW RADIO CORP	232A	3.30	34-13-31	56.8	27.09	115
CAMDEN	SC BMLH-910305KA	94.3	91	80-40-44	236.8	-87.9	SHORT
Deletion Proposed DOC-93-47 (RM-8188) MOVE TO CHANNEL 274A PROPOSED							
WHPD LIC	MARION CHR RADIO INC	232A	1.21	34-14-11	85.3	129.6	115
MARION	SC BLH-850626KL	94.3	152	79-31-23	165.3	14.61	CLEAR
Deletion Proposed DOC-93-47 (RM-8188) MOVE TO CHANNEL 232C3 AT LATTA, SC PROP							
PRM	PROPOSED RULE MAKING	232C3		34-25-33	74.2	136.3	142
LATTA	SC DOC-93-47	94.3		79-29-57	254.2	-5.67	SHORT
RM-8188; MOVE FROM 232A AT MARION, SC PROPOSED							
WGOR LIC	CSRA BROADCASTERS, INC	232A	3.00	33-26-17	235.9	129.8	115
MARTINEZ	GA BLH-830609AE	94.3	91	82-05-19	55.9	14.84	CLEAR
ORDERED TO CHANNEL 230C3							
NEW CP	RADIO BOWMAN INC	233A	3.00	33-19-17	169.2	87.06	72
BOWMAN	SC BPH-910301MH	94.5	100	80-44-52	349.2	15.06	CLEAR
CP Granted 04/01/93							
WMUU-FM LIC	WMUU INCORPORATED	233C	100	34-56-29	304.8	165.8	165
GREENVILLE	SC	94.5	366	82-24-41	124.8	0.783	CLOSE
NEW CP	IRIS COMMUNICATIONS, INC	234A	3.00	33-57-02	108.3	49.91	31
SUMTER	SC BPH-880310NS	94.7	100	80-24-41	288.3	18.91	CLEAR
CP Granted 03/26/93							

>> End of channel 232A study <<

ASSOCIATED RADIO RESOURCES, INC.
CHARLESTON, SCPage 1 of 1
May 11, 1993

FM Spacing Study

Title: Camden, SC
Channel 274A (102.7 MHz)
Database: ARR 04/14/93Latitude: 34-05-30
Longitude: 80-55-30
Safety zone: 26 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WMFX	LIC	BTMI, RECEIVER	272A	3.00	34-05-55	249.2	39.53	31
SAINT ANDREWS	SC	BLH-860313KF	102.3	98	81-04-48	69.2	8.532	CLEAR
WMFX	APP	BTMI, RECEIVER	272A	6.00	34-05-55	249.2	39.53	31
SAINT ANDREWS	SC	BPH-930204IB	102.3	100	81-04-48	69.2	8.532	CLEAR
WXLY	LIC	NO CHARLESTON RAD BCG IN	273C	100	32-47-44	154.1	176.7	165
NORTH CHARLESTON	SC	BLH-901030KC	102.5	305	79-50-27	334.1	11.72	CLEAR
PRM		PROPOSED RULE MAKING	274A		34-13-31	0.0	0.000	115
CAMDEN	SC	DOC-93-47	102.7		80-40-44	0.0	-	115 SHORT
MOVE FROM 232A PROPOSED								
WAJY	LIC	GRR MARKETING INC	274A	3.00	33-30-47	228.1	118.6	115
NEW ELLENTON	SC	BLH-900221KA	102.7	100	81-38-05	48.1	3.552	CLEAR
WEZC	LIC	KEYMARKET OF CHARLOTTE	275C1	31.3	35-24-26	342.7	137.5	133
HICKORY	NC	BLH-870904KB	102.9	468	81-07-47	162.7	4.521	CLEAR
WIGL	LIC	EAGLE OF ORANGEBURG INC	275A	3.00	33-27-53	196.2	87.93	72
ORANGEBURG	SC	BLH-871223KE	102.9	100	80-56-42	16.2	15.93	CLEAR
WSQN	LIC	ATLANTIC BCG COMPANY INC	275A	2.90	34-00-39	105.7	88.26	72
SCRANTON	SC	BLH-910711KE	102.9	142	79-45-24	285.7	16.26	CLEAR
WOMG-FM	LIC	PRICE-COLUMBIA CO LTD	276A	3.00	34-03-05	237.0	35.48	31
COLUMBIA	SC	BLH-821006AQ	103.1	91	81-00-07	57.0	4.476	CLEAR
WJMX-FM	LIC	ATLANTIC BCG COMPANY INC	277C2	43.5	34-30-19	66.4	77.68	55
CHERAW	SC	BLH-881123KA	103.3	160	79-54-15	246.4	22.68	CLEAR
WJMX-FM	CP	ATLANTIC BCG COMPANY INC	277C2	50.0	34-30-18	66.4	77.60	55
CHERAW	SC	BPH-910530IE	103.3	150	79-54-18	246.4	22.60	CLEAR

>> End of channel 274A study <<

CERTIFICATE OF SERVICE


I, Joseph Adams Ranke, do hereby certify that on this 12th day of May, 1993, I have caused to be mailed, via first class mail, postage prepaid, a copy of the foregoing "Comments and Counterproposal" to the following:

Gary S. Smithwick, Esquire
SMITHWICK & BELENDIUK, P.C.
1990 M Street, NW - Suite 510
Washington, DC 20036

Counsel to Winfas of Belhaven, Inc.

Kershaw Radio Corporation
Post Office Box 753
Camden, SC 29020

Licensee of WPUB-FM


Joseph Adams Ranke

May 12, 1993